

ELEMENT 3.1

ROLES AND RESPONSIBILITIES

An EMS should establish roles and responsibilities for environmental management. These roles and responsibilities must be clearly and effectively communicated to all employees. In addition, top management should designate an employee who (1) ensures that the EMS is established and implemented; (2) reports on the EMS's performance over time; and (3) works with others to modify the EMS when necessary.

The structure of a business will have a direct effect on the organization of personnel responsibilities for the EMS. ^[PT-1] Smaller businesses, such as many metal finishing facilities, have some advantages over larger businesses in creating an EMS team. For example, smaller businesses usually have less hierarchy, more direct lines of communication, and faster decision-making processes. Because many metal finishing employees often perform multiple functions, integrating environmental responsibilities with other functions can simplify the EMS structure and minimize use of resources. ^[ISO-1]

Procedure 3.1, Roles and Responsibilities, describes how to assign responsibilities and determine organizational roles for the EMS. The procedure can be implemented, in part, through the Responsibilities Matrix and Organizational Chart. The matrix and chart should be used to assign EMS responsibilities and can also be used to communicate these responsibilities to other people in the company. After EMS responsibilities have been assigned, it will be helpful to develop an organizational chart showing responsible employees, lines of communication and reporting, and any hierarchy that may be in place.

^[PT-1] **Add:** "The facility should have a defined procedure for providing appropriate incentives for personnel to meet the EMS requirements."

^[ISO-1] **Add:** "Management shall provide resources essential to the implementation and control of the environmental management system. Resources include human resources and specialized skills, technology, and financial resources."

Company Name	EMS Procedure	3.1
	Effective Date	
	Subject	Roles and Responsibilities

Purpose This procedure is used to determine the organizational roles and personnel responsibilities for the company's EMS.

Step 1 The company will first designate an environmental manager whose role is to oversee company environmental activities. The environmental manager and other facility personnel selected by the environmental manager are responsible for implementing the EMS. **ISO-1**

Step 2 The environmental manager will develop and assign EMS roles and responsibilities and document them using the Responsibility Matrix.

Step 3 The environmental manager will communicate EMS roles and responsibilities to all employees.

Step 4 The environmental manager and other facility personnel will review and update the EMS roles and responsibilities every 12 months **ISO-2**

Step 5 Roles and responsibilities documentation will be retained in accordance with the company or EMS-specific record retention policy.

Things to consider in developing and reviewing EMS roles and responsibilities:

- Capabilities of business
- Personnel involved
- Training and resources required
- Results of previous audits
- Improvement of current structure
- Integration with other business functions and existing management systems

Responsible Person: _____

Signature and Date: _____

ISO-1 Change to: "The company will designate an environmental manager whose roles are to oversee and implement the environmental management system and to report on the performance of the EMS to top management."

ISO-2 Add: "and report the performance to top management."

RESPONSIBILITY MATRIX

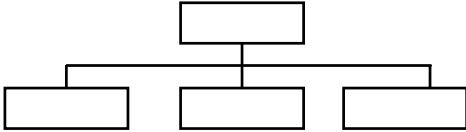
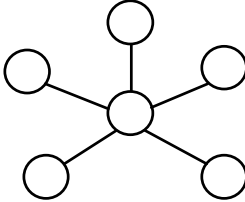
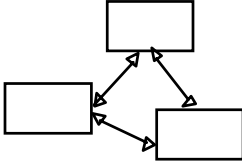
PERSONNEL

RESPONSIBILITY	Fill in names and “L” (lead) or “S” (supporting) responsibilities to EMS team members using the possible positions listed								
	Shop Owner	Environmental Manager	Plating Manager	Production Supervisor	Laboratory Staff	Maintenance	Accounting	All Employees	Other
Develop and distribute environmental policy									
Develop budget for environmental management									
Identify and prioritize environmental aspects									
Obtain and renew permits and develop compliance plans									
Comply with applicable regulatory requirements									
Track/analyze new regulations									
Establish environmental objectives and targets									
Develop EMS structure and identify personnel responsible									
Implement internal communication									
Coordinate external communication									
Train employees									
Integrate environmental metrics into performance appraisal process									
Coordinate emergency response efforts									
Track corrective and preventive action efforts									
Coordinate auditing efforts									
Conduct management review									

Responsible Person

Effective Date

(COMPANY NAME) EMS ORGANIZATION

Example Organizations		
		

Responsible Person

Effective Date

ELEMENT 3.2

COMMUNICATIONS

Communication is an important feature of a successful EMS. Active communication can increase the effectiveness of the EMS by (1) explaining environmental policy and how it relates to the overall business strategy; (2) motivating employees; (3) making sure roles and expectations are understood by all employees; (4) demonstrating management commitment; and (5) identifying potential system improvements.

Both internal and external communications should be performed to ensure that environmental goals are met. Internal communication should explain the environmental policy and address the EMS roles and responsibilities delegated to employees as well as progress toward specific objectives and targets. This communication should possess mechanisms for top-down and bottom-up information flow.

External communication is also an important element of the EMS. Communication with community groups and stakeholders in the business, such as regulators, local residents, stockholders, insurers, emergency responders, and customers interested in the environmental impacts of the business should be addressed and documented. By maintaining meaningful dialogue and a proactive approach with external parties, a company can more easily meet EMS and other business goals.

Procedure 3.2a, Internal Communication, describes how and when to initiate and document internal communication. The procedure can be implemented, in part, through the Internal Communications form. *Procedure 3.2b, External Communication*, describes how and when to initiate and document external communication. The procedure is implemented, in part, through the External Communications form. Both Internal and External Emergency Communications can be implemented through the *Emergency Responses Communications* form.

Company Name	EMS Procedure	3.2a
	Effective Date	
	Subject	Internal Communication

Purpose This procedure is used to ensure adequate internal communication about the EMS. ^{PT-1}

Step 1 Identification of internal audiences should be performed. Internal audiences will include employees and other stakeholders of the business who play a role in everyday business operations. This may include contractors.

Step 2 The environmental manager will determine the type of information that needs to be communicated. This may be general EMS policy information, individual EMS responsibilities, or specific waste reduction targets and measurements.

Methods of Internal Communication:

- Staff/employee meetings
- Newsletters
- Bulletin boards/posters
- Brown bag lunches
- Training
- Websites, Emails

Step 3 Based on the audience involved and type of information to communicate, the environmental manager will determine methods of internal communication. Initial forms of internal communication may include training, followed by meetings and postings in newsletters or bulletin boards.

Step 4 The environmental manager will determine the frequency of internal communication. Since the types of information being communicated will vary, the frequency with which the information will be communicated will also vary.

Step 5 The environmental manager and other facility personnel designated by the environmental manager will ensure that adequate internal communication occurs.

Step 6 Documentation of internal communications will be achieved using the Internal Communications and the Emergency Response Communications forms. All internal communication documentation will be retained at the facility in accordance with the company or EMS-specific record retention policy.

^{PT-1} **Change to:** “This procedure is used to communicate relevant information regarding the EMS, including the facility’s environmental performance throughout the facility.”

Responsible Person: _____

Signature and Date: _____

Company Name	EMS Procedure	3.2b
	Effective Date	
	Subject	External Communication

Purpose This procedure is used to ensure adequate external communication ^{PT-1}

Step 1 The environmental manager will identify external audiences. External audiences may include community members, customers, suppliers, and stakeholders in the company, such as neighbors, community groups, local officials, insurers, stockholders, regulatory agencies, and emergency responders.

Methods of External Communication:

- Open houses
- Focus groups
- Press releases
- Annual reports
- Advertising
- Community meetings
- Permits/applications
- Website

Step 2 The environmental manager will determine the type of EMS performance information that needs to be communicated. This may be company waste reduction successes, permit applications for new processes, or future plans to change business practices.

Step 3 Based on the audience and the type of information to be communicated, the environmental manager will determine methods of external communication.

Step 4 The environmental manager will determine the frequency of external communication. The types of information and the frequency with which the information will be communicated will vary.

Step 5 The environmental manager and other facility personnel designated by the environmental manager will ensure that adequate external communication is occurring.

Step 6 External communications will be documented using the External Communications and the Emergency Response Communications forms. All external communication documentation will be retained in accordance with the company or EMS specific record retention policy.

^{PT-1} **Change from:** “to ensure adequate internal communication about the EMS” to “for sharing information with the community on EMS performance.”

Responsible Person: _____

Signature and Date: _____

INTERNAL COMMUNICATIONS

Type of Information	Frequency of Communication	Audience	Form of Communication					
			Training	Staff Meeting	Individual Meeting	Bulletin Board	Newsletter	Other
Company Environmental Policy								
Identification of Environmental Aspects								
Prioritization of Environmental Aspects								
Compliance Awareness								
Targets and Objectives								
Individual EMS Responsibilities								
Process Change								
Emergency Response and Preparedness								
Measurement and Monitoring								
Corrective and Preventive Action								
Results of Audits and Management Review								
Other								

Responsible Person

Effective Date

EXTERNAL COMMUNICATIONS

Type of Information	Frequency of Communication	Audience	Form of Communication						
			Community Meeting	Individual Meeting	Newsletter	Advertising	Annual Report	Trade Group	Other
Company Environmental Policy									
Targets and Objectives for Waste Reduction									
Waste Reduction Successes									
Health and Safety Successes									
Preventive Actions									
Results of Audits and Management Review									
Future Company Changes									
Permit Applications									
Other									

Responsible Person

Effective Date

EMERGENCY RESPONSE COMMUNICATIONS

Type of Emergency	Audience				
	Emergency Responders	Employees	Community	Regulatory Agencies	Other
Chemical Release/Spill	Fire Department National Response Center	Notify by Sounding Alarm Telling to Vacate the Building	Notify Neighbors	Coast Guard POTW EPA DTSC	
Worker Injury	911 Fire Department Ambulance Hospital			OSHA	
Natural Disaster	911 Fire Department Ambulance Hospital				
Other					

Responsible Person

Effective Date

ELEMENT 3.3

TRAINING

Training is an important aspect of the EMS because it can be used to communicate to all

Training Hints:

- Use opportunities like safety meetings, staff meetings, and production meetings to provide “training” and reinforce EMS goals.
- Consider videotaping training sessions for use later as refreshers or with new employees.
- Factor training needs and abilities into hiring practices.

employees (1) the environmental impacts of their activities, (2) the company’s environmental policy, (3) EMS roles and responsibilities, and procedures, and (4) methods and actions for reducing waste generation and meeting EMS objectives and targets. **ISO-1**

Because every employee plays an integral role in the function of a business, it is important that the training needs of all employees be evaluated and met at a level that enables them to support the goals of the EMS in their daily activities. Training should be based on the **ISO-2** previous education, training, and work experience of an employee. **ISO-3**

ISO-1 Add: “Training should also indicate the consequences of departure from specified operating procedures

ISO-2 Add: “employee’s responsibilities as well as”

ISO-3 Add: “Personnel performing tasks that can cause significant environmental impacts must be competent on the basis of education, training and/or experience.”

Company Name	EMS Procedure	3.3
	Effective Date	
	Subject	Training

Purpose This procedure is used to develop and implement a training program that (1) complies with environmental regulations requiring training and (2) addresses high-priority environmental aspects and objectives and targets. **PT-1**

Step 1 A training program will be developed. This program will identify training topics, who should receive the training, when training should be given, and the training method. The program will also distinguish between training conducted to comply with environmental regulations and other training.

Step 2 A critical first step in developing a training program is to assess employee training needs. The environmental manager and others will review past training and the nature of the employee's work. Based on this review, specific training requirements for each employee or type of employee will be documented.

Training Resources:

- Internal trainers
- Consultants
- Educational institutions
- Suppliers/vendors
- Technical/trade associations
- Self study
- Computer-based training

PT-1 **Change:** (2) **to:** “provides general environmental awareness for all employees, and” **and add:** “(3) provides specific training for those whose jobs and responsibilities involve activities directly related to achieving objectives and targets and to compliance with legal requirements.”

Step 3 The training program will be implemented and training dates, subjects, and attendees will be documented. **ISO-1**

Step 4 Training documentation will be retained at the facility in accordance with the company or EMS-specific record retention policy.

Step 5 Training effectiveness will be evaluated to ensure that the EMS is being implemented effectively. Improvements to trainings will be made accordingly.

When Training is Needed:

- New hire
- New job/change in employees role or responsibility
- Procedure change
- New process, material, or equipment
- New regulation
- Increase employee performance

Responsible Person: _____

Signature and Date: _____

ISO-1 Add: “Elements to be covered in the training include: 1) the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system; 2) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance; 3) the roles and responsibilities to achieve conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements; 4) the potential consequences of departure from specified operating procedures.”

TRAINING NEEDS

Employee Name: _____

Job Function(s): _____

Date: _____

Training Completed: _____

Training Required: _____

TRAINING PROGRAM
YEAR _____

Topic Title	JOB FUNCTIONS					
	Platers	Maintenance	Waste Treatment	Lab	Shift/Line Supervisors	Management
EMS Awareness						
Supervisor EHS Training						
Hazardous Waste Management						
Wastewater Treatment						
Spill Prevention & Response						
Chemical Handling						
Emergency Response						
Dragout Reduction						
Hazard Communication						
Personal Protective Equipment						
Fire Safety						
Electrical Safety						
Hearing Conservation						
Job-Specific Training (List)						

Enter dates or frequency of each training.

Responsible Person

Effective Date

EMS DOCUMENT CONTROL

The purpose of EMS document control is to ensure that the facility creates and maintains documents in a manner and to the extent necessary to implement the EMS. The primary focus of the organization should be effective EMS implementation, not a large documentation control system. There are several types of documents that are integral to the EMS, including the environmental policy and various written procedures, records, and forms used to implement the EMS. **Document control ensures that EMS documents can be easily located, periodically reviewed and updated as needed, and removed when obsolete.**

- Controlled documents should be centrally located at your facility, usually with the environmental manager. **[ISO-1]**

In addition, controlled documents should feature the following characteristics:

- Effective date
- Approval signature and date
- Copy number (if more than one controlled copy is required)

Document control should usually be the responsibility of one person, usually the environmental manager. Procedure 3.4 describes document control.

[ISO-1] Change to: “Current versions of relevant documentations should be available at all locations where operations essential to the effective functioning of the EMS are performed. The EMS should specifically control all documents to ensure that: They can be located; They are periodically reviewed; Current versions are available; Obsolete documents are promptly removed and assured against unintended use; and Any obsolete documents retained for legal preservation, etc are clearly identified as such.”

Company Name	EMS Procedure	3.4
	Effective Date	
	Subject	EMS Document Control

Purpose This procedure governs EMS document control.

Step 1 The environmental manager is responsible for EMS document control. EMS documents that are addressed by this document control procedure may include the following:

- ✓ The environmental policy
- ✓ All EMS procedures (including this one)
- ✓ The following completed EMS Template forms used to implement EMS procedures:
 - Environmental aspects tables
 - Compliance self-assessment checklist
 - Compliance calendar
 - Objectives and targets matrix
 - Organizational chart
 - Training needs
 - Emergency, internal, and external communication

Step 2 The controlled EMS documents listed in Step 1 will be designated by headers and/or footers with the following:

- Effective date
- Approval signature and date

Step 3 The controlled EMS documents listed in Step 1 will be maintained in a binder or file under the safekeeping and control of the facility environmental manager.

Step 4 The collection of controlled EMS documents will contain an index of all documents and a distribution list that identifies other facility personnel who should receive copies of EMS documents.

Step 5 The index of controlled EMS documents will be updated whenever one of the documents is revised.

Responsible Person: _____

Signature and Date: _____

ELEMENT 3.4A

EMS DOCUMENTATION

ISO/PT-1 EMS Documentation describes what comprises your systems, which is supported by the EMS records. The documentation is important to the success of your EMS for several reasons:

- **Consistency.** Word-of-mouth information is rarely communicated consistently, whereas written information is more likely to be constant from person to person and over time. Documentation is vital to maintaining consistency in an EMS over time and from department to department. Since change occurs so frequently, accurate documentation makes it easier to maintain an effective and flexible EMS.
- **Assessment of Progress.** Creating documentation helps you assess the progress of your EMS. Some inconsistencies show up only as you commit your ideas to paper and having a record allows you to check on progress and evaluate results.
- **Demonstration.** Documentation demonstrates that your EMS is complete and functioning.

EMS Documentation includes:

- Environmental Policy
- Key EMS elements
- Organizational chart
- Tables of key responsibilities
- System-level procedures
- Activity or process-specific operational control procedures/work instructions
- Compliance Checklist
- Corrective and Preventive Action
- Other EMS-related document
- Audit Findings

ISO/PT-1 Please note: This additional element (as suggested here, 3.4A), entitled EMS Documentation, directs users and provides guidance about establishing and maintaining information, in paper or electronic form, which describes the core elements of the management systems and provides direction to related documentation.

	EMS Procedure	3.4A
	Effective Date	
	Subject	EMS Documentation

Purpose This procedure governs EMS documentation.

Step 1 The environmental manager is responsible for EMS documentation. Before beginning documentation steps, the environmental manager will research the existing documentation. The goal of this search is to locate materials you can use to begin your EMS implementation and documentation.

Step 2 The environmental manager will determine the detail needed in the documentation. The manager may use the following questions as guidelines for creating new documentation:

- How can we use or revise existing documents rather than creating new ones?
- Does our business operate in a single location or many? This will affect who creates some of the documents and where they are located. It may also affect how many versions of a document might be necessary to cover different circumstances.
- What is our current computer capability? Many companies use an electronic system to maintain documents.
- What security precautions do we need? While computer systems are handy, they often can be accessed by a number of people. Electronic documentation can be edited or destroyed. Security, or at least restrictions on who can change data, can be a critical issue for many companies that use electronic documentation systems.

Step 3 The environmental manager will decide the format (document and page appearance) for the EMS documents. This may be the existing company standard, if it exists, or a new standard. The manager will consider whether pages are single- or double-sided and why; choose margins, header, footer, typefaces, text, headings, etc. Include plans for bulleted and numbered lists, tables, and even paragraph spacing.

Step 4 The manager will also consider what is needed for the document and design each document template by creating an outline. The manager will also consult those who actually use the documents. Involving them in the process should help make sure the documents are usable and applied to support the EMS.

Responsible Person: _____

Signature and Date: _____

Documentation Worksheet A

Is there existing EMS documentation?	
How is this EMS documentation maintained? (Electronically? Paper?)	
Who is responsible for maintaining EMS documentation?	
Does the EMS manual or other summary documents describe the key elements of the EMS? If so, does this document describe the linkages among system elements?	
What does the EMS documentation consist of? (List components such as environmental policy, EMS manual, activity-level procedures or work instructions, emergency plans, etc.)	
Is the EMS documentation integrated with other organizational documentation (such as human resource plans or quality procedures)? If so, how is proper coordination between environmental and these other functions ensured?	
How do we ensure that the EMS documentation is up-to-date?	

Documentation Worksheet B

Documents	Determine Format: Who/ Date Completed	Develop Prototype/ Draft: Who/ Date Completed	Assign Writing: Who/ Date	Review Writing/ Compare to Prototype/Draft: Who/ Date	Added to Document List/ Date	Who Has Access	Where Located
Existing Documents							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
Documents to be Created							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
Contact Person: _____ Date Completed: _____							

OPERATIONAL CONTROL

ISO-1 To ensure that you satisfy the commitments in your environmental policy, certain operations and activities must be controlled. Where operations or activities are complex and/or the potential environmental impacts are significant, operational controls should include operational control procedures. Procedures can help your organization to manage its significant environmental aspects (SEAs), ensure regulatory compliance, and achieve environmental objectives. Procedures can also play an important role in employee training.

The company should plan operations and activities, including maintenance, in order to ensure that they are carried out under specified conditions by:

1. Establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets;
2. Stipulating operating criteria in the procedures; and
3. Establishing and maintaining procedures related to the significant environmental aspects of goods and services used by the company and communicating relevant procedures and requirements to suppliers and contractors.

Operational control may improve the management of the following types of activities:

- Management/disposal of wastes
- Approval of new chemical use
- Production processes or operations
- Storage & handling of raw materials and chemicals
- Wastewater treatment
- Building and vehicle maintenance
- Transportation
- Operation and maintenance of equipment
- Marketing and advertising
- Acquisition or construction of property and facilities

ISO-1 Please note: This additional element, entitled Operational Control (as suggested here, 3.5), directs users to identify those operations and activities that are associated with the identified significant environmental aspects.

	EMS Procedure	3.5
	Effective Date	
	Subject	Operational Control

Purpose This procedure governs Operational Control of the organization.

Step 1 The environmental manager will determine the possible causes of a potential impact for all significant environmental aspects.

Step 2 The environmental manager will also set targets and measurement indicators for each objective. The targets will reflect correction of the cause identified in Step 1. Using measurement indicators, you can determine if your operational controls are helping you meet your objectives.

Step 3 Each aspect that could potentially deviate from environmental policy and objectives and targets requires a documented procedure. Some of the documented operation control procedure may already exist. The environmental manager will identify those procedures that exist and those that need to be developed. In some cases the procedures that you have in place to comply with environmental and health and safety regulations may be useful to meet your EMS objectives.

The manager will consult with those implementing the procedures when developing them. To do this, the manager will:

- Meet with staff and have them describe current procedures. Discuss the environmental objective desired and obtain their input on operational controls procedures to ensure that the objectives will be met.
- Have a staff member interview the workers to establish current documented or undocumented procedures. Once you have drafted or revised operational controls, have the staff and a manager review it and incorporate their input.

Step 4 The manager will then designate responsibility for maintaining and reviewing operational controls to ensure that procedures are followed and deviations are corrected.

Step 5 A training program will be developed to ensure that everyone understands the controls and their role in ensuring that they are followed. Training can include on-the-job training.

Step 6 Finally, when objectives are not met, corrective action is taken to correct failures in operational controls as quickly as possible to meet environmental objectives.

Responsible Person: _____

Signature and Date: _____

Operational Control Worksheet

<p>Have we identified operations and activities associated with significant environmental aspects, legal and other requirements, and environmental objectives?</p> <p>If not, how will this be accomplished? Who should be involved?</p>	
<p>What operations and activities are associated with significant environmental aspects?</p>	
<p>What operations and activities are associated with legal and other requirements?</p>	
<p>What operations and activities are associated with environmental objectives and targets?</p>	
<p>How are the above operations and activities controlled?</p>	
<p>Are the controls are adequate?</p>	
<p>How do we train employees and contractors on relevant operating controls?</p>	
<p>If new controls are needed (or existing ones need to be revised), what is our process and who is involved?</p>	

EMERGENCY RESPONSE AND PREPAREDNESS

Most metal finishing facilities have experienced an event that required some kind of emergency response. Unfortunate events such as an employee injury, a spill of hazardous chemicals, or a fire do occasionally occur. With the large number of hazardous chemicals and the potential for accidents inherent in a manufacturing setting, metal finishing facilities should be particularly vigilant in planning and preparing for **ISO-1** emergencies. Emergency planning can limit injuries; protect employees, neighbors and the environment, reduce asset losses, and minimize downtime.

An effective emergency response and preparedness program should include provisions for:

- Assessing the potential for accidents and emergencies;
- Preventing incidents and their associated environmental impacts;
- Responding to incidents **ISO-2**
- Mitigating impacts associated with these incidents **ISO-3**

Procedure 3.6, Emergency Response and Preparedness, describes the personnel responsible for completing emergency preparations and incident reviews, and how and when the tasks will be completed. There are many overlapping requirements in local, state and federal regulations concerning emergency response and preparedness.

Often, the most difficult part of developing emergency preparedness and response plans is identifying the potential for accidents and emergencies. The environmental manager should form a team composed of company personnel (and outside consultants or regulators if necessary or beneficial) to examine all facility activities. Extend your evaluation beyond those facility materials and operations that are obviously or inherently dangerous; ask “what if” questions under both normal and abnormal conditions.

Helpful Documents:

- Process flow diagrams
- Plant maps
- Drainage plans
- Design codes and standards

ISO-1 Add: “as well as responding to”

ISO-2 Add: “Reviewing and revising where necessary emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations”

ISO-3 Add: “Testing procedures periodically, where practicable.”

No tool is provided for this element because the tools and forms associated with emergency response and preparedness are already included as part of the documents required by federal, state, and local regulations.

Company Name	EMS Procedure	3.6
	Effective Date	
	Subject	Emergency Response and Preparedness

Purpose This procedure is used to anticipate, document, prepare, and review emergency events and preparedness plans **ISO-1**

Step 1 The environmental manager and other facility personnel selected by the environmental manager are responsible for identifying dangers, taking proactive steps to prevent emergency incidents, and completing tasks in preparation for emergencies.

Step 2 The environmental manager will prepare and update an Emergency Response Plan that contains all emergency procedures required by local, state and federal regulatory agencies.

Step 3 The environmental manager will familiarize and train employees and emergency coordinators on the procedures described in the Emergency Response Plan.

Step 4 Following each emergency incident, the environmental manager, emergency coordinators and the involved employees will determine the cause of the emergency, evaluate the response to the incident, and identify actions to be taken to minimize its recurrence. **ISO-2**

Step 4 At least twice per year, the environmental manager and other facility personnel will review the Emergency Response Plan and any emergency incidents that occurred since the last review. **ISO-3** **ISO-4**

Step 5 Documentation concerning emergency response and preparedness and emergency incidents will be retained at the facility for at least 5 years.

ISO-1 Add: “and to periodically test response procedures.”

ISO-2 Add: “Additionally, they will review the response and mitigation procedures, and revise as necessary.”

ISO-3 Change from: “and any emergency incidents that occurred since the last review” to “and update or revise the Plan for new equipment and processes, etc.”

ISO-4 Add: “**Step 5** As practicable, the facility will run a simulate emergency to test procedures. Following the simulation, the environmental manager and other staff involved will evaluate the procedures and revise, as necessary.”

Responsible Person: _____

Signature and Date: _____